



Memorandum

March 30, 2020

To: Brian Kelly, U.S. EPA
Lori Kozel, Tetra Tech

Ref. No.: 048041

From: Glenn Turchan, Lisa Clements/kf/177

CC: Grant Gilezan – Dykema Gossett
Anastasia Bremmer, Bert Richnafsky – NPOS Respondents

Subject: **Response to February 14, 2020 U.S. EPA Email Comments – Future Quarterly Progress Reports
Former Dearborn Refining Site ("Site"), Dearborn, Michigan**

This Memorandum presents the NPOS Respondents responses to the United States Environmental Protection Agency (U.S. EPA) February 14, 2020 email comments regarding the Dearborn Refining Site (Site) future Quarterly Progress Reports (QPRs).

U.S. EPA Comment 1:

Include a narrative summarizing LNAPL measurements (well count, max, min, whether inside or outside cell), soil gas analytical results (VOCs) and groundwater analytical results.

Response to U.S. EPA Comment 1:

The QPR text will identify the number of wells with light non-aqueous phase liquid (LNAPL) present during the quarterly monitoring event and the minimum and maximum LNAPL thicknesses measured. The third quarter QPR text will also identify any soil gas and groundwater data above criteria, as identified in Tables 5 and 6 of the QPR (soil gas and groundwater samples are collected during the third quarter monitoring events).

The Cover System components (e.g., grass, gravel, swale, fence, and liner) are depicted on the QPR figures. The location of the wells with respect to the Cover System components will be identified in the future QPRs.

U.S. EPA Comment 2:

Table 4. Include an excel version of the table.

- a. Bold methane data that exceeds the action level.***
- b. When well/vent/probe screens are submerged, include that information as a data qualifier.***



Response to U.S. EPA Comment 2:

An excel version of QPR Table 4 will be included with the submittal of the QPRs to the U.S. EPA. The methane results above 1.25 percent will be bolded in Table 4. The QPR tables will be updated to include screen depth. Wells with screens below the water table will be noted accordingly. Depth to water is presented in Table 1 of the QPRs.

U.S. EPA Comment 3:

Figure 1. The legend does not include descriptive labels for the four line types labeled “Line 1, Line 2, Line 3, and Line 4.”

Response to U.S. EPA Comment 3:

Line 1, Line 2, Line 3, and Line 4 presented on Figure 1 of the QPR are former aboveground Multi-Phase Extraction (MPE) System pipes that were removed during MPE System decommissioning. These lines will be removed from Figure 1 for clarity.

U.S. EPA Comment 4:

Include an LNAPL map.

Response to U.S. EPA Comment 4:

An additional figure depicting LNAPL will be prepared for inclusion in the QPRs. It should be noted that it was determined that the LNAPL body is stable in overall extent (not migrating) prior to decommissioning the MPE System. The Site LNAPL transmissivity estimations indicated that all tested wells exhibited LNAPL transmissivities that are less than the de minimis LNAPL recoverability/transmissivity criterion of 0.5 feet²/day (Michigan Department of Environment, Great Lakes, and Energy (formerly the Michigan Department of Environmental Quality) draft Petroleum NAPL Policy). Additional information is presented in the LNAPL Transmissivity Evaluation Results and Recommendations Report submitted to the U.S. EPA on March 7, 2014. It should also be noted that LNAPL was not observed in any off-Site sentry wells to date.

U.S. EPA Comment 5:

Attachments. Include methane field datasheets that show screen depth and depth to water.

Response to U.S. EPA Comment 5:

The QPR tables will be updated to include screen depth. Depth to water is presented in Table 1 of the QPRs.